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October 4, 2023

Via ECF and Email

The Honorable Coleen McMahon
United States District Court Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Sabitri Laforest, Garry Laforest, et al*
        21 cr 272

Dear Judge McMahon:

I represent Sabitri Laforest in the above-referenced matter. Thomas Dunn, Esq. represents Garry Laforest. Mr. Dunn joins in this application. With the consent of the Government, I write to seek an extension of their reporting date from October 16th until October 30, 2023 before 2:00 PM.

On July 13th, 2023, Your Honor sentenced Ms. Laforest to serve a term of 73-months to be followed by 3 years supervised release and Mr. Laforest to a term of 55 months to be followed by 3 years supervised release. Your Honor permitted both Ms. Laforest and her husband to self-surrender to their respective designated facility by 2:00 PM on October 16th, 2023. Ms and Mr. Laforest have received their notice to report to their designated facility on October 16th.

The requested extension is sought to permit the closing of the sale of their home in Florida which is now scheduled for October 25, 2023. Ms. Laforest and Mr. Laforest must be present in Florida for the closing. Importantly, the Government has approved the sale and, after deduction of any liens on the property, the remainder of the proceeds from the sale of the property will go directly to the Government and serve to reduce these Defendants forfeiture judgement. I requested a few extra days for Ms. Laforest and Mr. Laforest to travel back to Queens from Florida, and with respect to Ms. Laforest travel to FCI Aliceville, Alabama where she is designated to report. Thank you for your consideration of this request.

Respectfully submitted,
/s/
Donna R. Newman
Cc: AUSA Matthew Shahabian
    Thomas Dunn, Esq.
    Sabitri Laforest via email